

RECOMMENDATIONS FROM GENERAL COMMENTS

Commenter	Subject	Topic	Comments
G-01 Western Governors' Association	General Program Management	State-Federal Coordination	WGA and the Federal Agencies responsible for transmission facilities should find opportunities to meet and develop collaborative processes for permitting transmission and pipeline rights-of-way.
G-02 National Hydropower Assoc	Hydro	Appeals	Establish admin appeals process and rescind Joint Policy for Review of Mandatory conditions. Set substantive standards for mandatory conditions.
G-02 National Hydropower Assoc	Hydro	Conditioning	Use sound science, consider economic impacts, and consult with FERC when setting conditions via express policies and rules adopted by departments.
G-02 National Hydropower Assoc	Hydro	ESA Consultation	Integrate this into licensing process - DOI, DOC & FERC should establish joint rules to do this.
G-02 National Hydropower Assoc	Hydro	Fish ways	Withdraw Interagency Policy on Prescription of Fish ways 12/22/00.
G-02 National Hydropower Assoc	Hydro	International	Establish special rules for international waters subject to joint international regulation; eliminate duplication between FERC and IJC
G-02 National Hydropower Assoc	Hydro	Intervention	Limit this to scope and jurisdiction, not as interveners - obtain needed mitigations through conditions.
G-02 National Hydropower Assoc	Hydro	Legislation	Sec 4(e) and 18 - greater consideration of impacts; require cost effective alternatives; streamlined and cooperative environmental review
G-02 National Hydropower Assoc	Hydro	Secretarial Involvement	Secretaries should get directly involved and be willing to step in when necessary to resolve disputes.
G-02 National Hydropower Assoc	Hydro	Timelines	Comply with 18CFR.4.34 FERC Regulations.
G-03 California ISO	Electric Transmission Line Construction	Lands held in Trust for Native American Indians	Native Americans purchase private lands identified for electrical transmission line uses. The native Americans do not want the power line constructed. The Native Americans are requesting the U.S. Government take these lands into trust. Trust lands cannot be condemned for utility uses.
G-03 California ISO	Electric Transmission Line Construction	ROW corridor planning	The U.S. would greatly benefit from a national system of identified corridors, established by coordinated planning efforts.

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G-03 California ISO	Electric Transmission Line Construction	ROW corridor planning	The U.S. should have the authority to prevent late administrative or legislative intervention in the siting of facilities within identified corridors.
G-04 Defenders of Wildlife	Oil & Gas prod.	Agency resources	Don't siphon agency resources from equally crucial non-energy projects; don't interfere with planning process of land mgt agencies; review & correct BLM "tiering;" improve public notice practices of BLM in Wyoming; Consider BLM's post permitting duties w/respect to inspection, enforcement and monitoring & delegation to states of analysis of well spacing, timing and duration.
G-04 Defenders of Wildlife	Oil & Gas prod.	Exec Order	Balance competing resource values; Don't break the law; Only eliminate unnecessary and non-legally required impediments; give equal weight to nominations opposing energy; address pro's and cons of expediting <u>decisions on energy projects through land management planning</u> ;
G-04 Defenders of Wildlife	Oil & Gas prod.	Scope of TF	Do not expedite decisions on: Rocky Mt Front, MT; Bridget-Teton NF, WY; Upper Green River Basin, WY; Red Desert/Jack Morrow Hills, WY; Powder River Basin, WY; Southeastern Green River Basin, WY; Piceance/Uinta Basins, CO & UT; San Juan Basin, NM; Otero Mesa, NM;
G-05 Urban Engineers	NEPA	NEPA	Comments and/or recommendations to improve (but not weaken) the NEPA Review Process
G-06 Williams Energy Services	E.O. 13212	Purpose and Makeup of Task Force	Recommends including FERC in management and staff level of Task Force
G-06 Williams Energy Services	Interstate Pipeline or Electric Transmission Projects	Permitting procedures	Recommends Task Force utilize FERC's pre-filing approach (engage an environmental contractor to help identify and resolve issues with pertinent agencies and stakeholders prior to filing of application) for energy transmission corridor projects; create a model for administrative changes
G-07 American Electric Power	Electric Transmission Infrastructure	Elimination of regulatory disincentives	Suggests that FERC should accelerate and shorten the rate review process so transmission investments can be included in utility rates in a reasonable period of time. In addition, FERC should provide incentives including higher returns on equity, accelerated depreciation, and merchant transmission <u>opportunities to encourage investments</u> .
G-07 American Electric Power	Electric Transmission infrastructure	Federal role in permitting process	Recommends an expanded federal role over the review and approval process. Alternatively, suggests streamlining federal process by, for example, designating a single federal agency to review and approve transmission system, or requiring a lead agency to develop and coordinate a schedule with assignments and deadlines to other federal agencies.

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G-07 American Electric Power	Electric Transmission Project	Extended permit review process	Summarizes the extensive permit history for a transmission reinforcement project that involved multiple federal and state agencies and triggered the review procedures under the Wild and Scenic Rivers Act, the Endangered Species Act, the National Historic Preservation Act, and the National Environmental Policy Act, among others. This summary was to support the main point that the federal approval process should be streamlined to facilitate the development, permitting, siting, and construction of new and upgraded electricity transmission investments.
G-08 Public Service Co. of New Mexico	General program management	General	The task force should eliminate duplicative processes and establish timeframes for agency review and approval.
G-08 Public Service Co. of New Mexico	General program management	General	Agencies tend to include environmental issues, and extend jurisdiction to environmental matters, when it is not part of their mission and there are others who do that. Examples are environmental issues raised by the state utility commission, and expansion of jurisdiction by the COE. Again, time frames for action should be created, and all agencies should be bound by the decision of the body that has primary jurisdiction over an issue.
G-08 Public Service Co. of New Mexico	General program management	General	Reviews should be run concurrently, not sequentially.
G-08 Public Service Co. of New Mexico	General program management	NEPA	NEPA process in particular needs time frames in which lead and consulting agencies must conclude their deliberation. If time frames not met, approval is granted.
G-08 Public Service Co. of New Mexico	General program management	NEPA	NEPA should provide more categorical exclusions.
G-08 Public Service Co. of New Mexico	General program management	NEPA	Need greater coordination between agencies in NEPA process and greater consistency in selection of lead and consulting agencies.
G-08 Public Service Co. of New Mexico	General program management	NEPA	Other agencies should abide by the decision of the lead agency.
G-08 Public Service Co. of New Mexico	General program management	State-fed coordination	Better coordination is also needed between Federal, state and local agencies. There is no ready solution short of creating a mega-coordinating body at Federal level with pre-emptive authority. Again, statutory timeframes should be established, and all entities should be required to abide by the decision of the lead agency.

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G-08 Public Service Co. of New Mexico	General program management	Tribal jurisdiction	Assertion of jurisdiction in the environmental arena by tribal or other Native American entities has become increasingly problematic. Checkerboard land ownership patterns complicate things further.
G-08 Public Service Co. of New Mexico	General program management	Tribal jurisdiction	EPA took too broad a view of the CAA requirements as to which tribes should be treated as states (i.e., have regulatory authority), under CAA s. 301(d)(2).
G-08 Public Service Co. of New Mexico	General program management	Tribal jurisdiction	Should conduct a thorough statutory and regulatory review with the aim of minimizing or eliminating overlapping/conflicting jurisdictional problems.
G-09 American Transmission Company	Electric Transmission Line Construction	Coordinated and consistent Federal agency permitting requirements	Recognizing the different missions of the Federal Agencies, it would be helpful to applicants to have coordinated and consistent Federal permitting needs and requirements.
G-09 American Transmission Company	Electric Transmission Line Construction	Federal/State NEPA requirement	Coordinate Federal NEPA requirements with the environmental review requirements of the States.
G-09 American Transmission Company	Electric Transmission Line Construction	Native American Coordination	DOI should facilitate coordination activities with Native Americans.
G-09 American Transmission Company	Electric Transmission Line Construction	Third party funding of environments documents	Allow the use of third party funding of the NEPA process
G-10 Western Organization of Resource Councils	Energy Policy	Coal Bed Methane	Federal Government is not following the pertinent laws and regulations in permitting coal bed methane development. NEPA analysis is inadequate for decision-making. Federal government must take a leadership role to fill regulatory shortcomings of States. No need to fast-track permit activities.
G-11 Lance & Mary Lindwall	NEPA	NEPA	Standardize Regulations across agencies; use C.E. more.
G-12 TECO Energy (Tampa Electric)	Electricity generation	NSR reform	Regulatory uncertainty is a major concern for business planning. EPA's new approach on what is routine repair and maintenance exempt from permitting cited as example of area where there is uncertainty
G-12 TECO Energy (Tampa Electric)	Electricity generation	NSR reform	On NSR permitting (EPA), companies should have a "safe harbor" for a period of time such as 15 years, during which no new requirements would be applied. At end of the time period there would be a comprehensive review to bring "up to code".
G-12 TECO Energy (Tampa Electric)	Electricity generation	NSR reform	TECO supports multipollutant legislation.

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G-12 TECO Energy (Tampa Electric)	Electricity generation	Process coordination	Florida has “one-stop” approach to power plant siting. This approach should be adopted across the nation.
G-12 TECO Energy (Tampa Electric)	Electricity transmission	Process coordination	Florida has “one-stop” approach to transmission line siting. This approach should be adopted across the nation.
G-13 Salt River Project	Electric Transmission Line Construction	Definition of Federal undertaking	Redefine the definition of Federal undertaking to eliminate smaller proposals, so as to concentrate on larger proposals.
G-13 Salt River Project	Electric Transmission Line Construction	Endangered Species Act (ESA) and National Historic preservation Act (NHPA) compliance	Establish mandatory time frames for Federal Agencies to comply with the requirements of the ESA and NHPA.
G-13 Salt River Project	Electric Transmission Line Construction	Inconsistent Federal and Tribal Policies	Establish a single independent Federal “committee” to coordinate and streamline all aspects electrical production and transmission line siting.
G-14 The Wildlife Society	General program management	Accountability	Do not set rigid timeframes for agency action on projects, with automatic approval if not denied in that timeframe. Complex projects require more time.
G-14 The Wildlife Society	General program management	Adaptive management	Use adaptive resource management.
G-14 The Wildlife Society	General program management	Agency resources	Increase staffing at BLM for biologists to do inventoring and work on NEPA.
G-14 The Wildlife Society	General program management	Best practices	Develop standardized best environmental practices for oil, gas & coalbed methane projects (apparently, with intent to streamline reviews if projects meet the criteria)
G-14 The Wildlife Society	General program management	General	Convene a “facilitated discussion” between energy interests and conservation interests.
G-14 The Wildlife Society	General program management	Wildlife	Permitting should address how wildlife impacts should be mitigated or avoided.
G-14 The Wildlife Society	General program management	Wildlife	In defining “success” for the task force, one measure should be ensuring serious and thorough consideration of impacts on wildlife
G-14 The Wildlife Society	Purpose and Makeup of Task Force	General	A biologist should be on the Task Force
G-14 The Wildlife Society	Purpose and Makeup of Task Force	No rollback	Do not “revoke the level of Federal oversight that currently exists” – states may not protect wildlife interests as fully

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G-15 Wildlife Mgt Inst	Oil & Gas Devel.	Environmental Impact	Stable funding source should be created for fish and wildlife habitats and other natural resources to assist the affected states in managing these resources through the development period. Proposes tapping revenues from on-shore oil and gas producers.
G-16 Petroleum Association of Wyoming	General Program Management	Access to Federal Oil and Gas Resources	Need to clarify existing policy guidance from federal agencies. Need to continue access to resources as NEPA documentation is being updated. Need to clarify timeline for wilderness inventory. Guidance on historic trail viewsheds should be revisited to clarify intent and scope. Policy on federal actions affecting non-federal lands should be reviewed.
G-17 Georgians for Clean Energy	EO 13212	NSR	Refer to written comments to EPA's 90 day review of the interpretation and enforcement of clean air act NSR programs a) oral public comments in Baton Rouge on 7/20/01 and b) sign-on support of written comments submitted by clean air task force, 7/24/01, EPA docket No. A-2001-19.
G-17 Georgians for Clean Energy	EO 13212	Scope of TF	Do not weaken environmental regulation of energy projects (NSR permitting in particular); do not eliminate EPA's Federal, legal responsibilities to ensure that energy projects meet NSR requirements; do not push to expedite environmentally destructive energy projects; do not curtail or eliminate public involvement process.
G-18 FPL Energy	Electricity generation	Best practices	Air permits define clean emissions criteria, expedite permitting if they are met (is this similar to presumptive BACT?)
G-18 FPL Energy	Electricity generation	Best practices	Water permits define criteria for "once through cooling water", expedite permitting if the criteria are met.
G-18 FPL Energy	General program management	Process coordination	Need to coordinate reviews by multiple agencies. S. 404 (COE) permits cited as example, where EPA and FWS comment. Comments should be coordinated concurrently. Last minute reviews and comments are a problem. Issue arises with both generation and transmission siting.
G-19 Williams Energy Services	Pipeline (Gas)	Clean Air Act	Establish a policy to allow in kind replacement for small gas fired combustion turbines
G-20 Western Utility Group	Electric Transmission Lines and Pipelines, (Rights-of-Way)	Agency resources	Rents collected for the use of agency-administered lands should be returned to the respective Field Offices.
G-20 Western Utility Group	Electric Transmission Lines and Pipelines, (Rights-of-Way)	Consultations	Do not consult with agencies or Native Americans if their lands are not directly traversed by a project.

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G-20 Western Utility Group	Electric Transmission Lines and Pipelines, (Rights-of-Way)	Inter-Agency coordination	Establish "Lead Agency" for inter-agency projects. Lead agency should have approval authority for all Federal land use decisions.
G-20 Western Utility Group	Electric Transmission Lines and Pipelines, (Rights-of-Way)	NEPA	Do not include non-Federal lands not directly affected by the project within the scope of cumulative impacts.
G-20 Western Utility Group	Electric Transmission Lines and Pipelines, (Rights-of-Way)	ROW corridor planning	USDA and DOI should formalize acceptance of the 1992 Western Regional Corridor Study. All Federal land managing agencies should be required to use the study as a land use planning tool.
G-21 Calpine	Electricity generation	Accountability	Many agencies participate, each has its own mission and getting projects on line is not the priority for them. This is appropriate but there needs to be an overall "champion" to ride hard on the agencies and move projects through the process. The task force can play this role.
G-21 Calpine	Electricity generation	Accountability	Create in each agency a facility siting team, charged with preparing a list of facilities with pending permits. Set proposed deadlines, follow up and create accountability measures (e.g., post status on the internet). Provide awards to those who move projects quickly.
G-21 Calpine	Electricity generation	Accountability	Invite states/tribes/other agencies to take a similar approach.
G-21 Calpine	Electricity generation	Administrative appeals	Permit appeals to EPA's Environmental Appeals Board prevent any construction until the appeal is denied. EAB should change its rules to require appellants to seek a stay and meet TRO standards; allowing construction w/out environmental effects to proceed at the company's risk.
G-21 Calpine	Electricity generation	Administrative appeals	EAB should set a 60-day deadline for action on permit appeals
G-21 Calpine	Electricity generation	General	EPA should develop a standard list of what is required for a permit application to be complete.
G-21 Calpine	Electricity generation	NSR - trading	Where trading programs apply, new units should be provided "an appropriate allocation of emission credits" rather than having to buy them from existing facilities. This would require legislation.
G-21 Calpine	Electricity generation	NSR reform	EPA should set performance-based criteria that would allow faster action on permit applications that meet those criteria.

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G-21 Calpine	Electricity Interconnection	BPA/TVA	"The BPA Problem" - BPA has a long queue of projects asking for interconnection. Some are not really viable projects, but BPA has a first come first served policy. They should do viability screening. BPA is aware of the problem and has asked for input; it would require a tariff change. The task force should work with FERC and BPA on the issue.
G-21 Calpine	Electricity Interconnection	BPA/TVA	"The TVA Problem" -- TVA does not act promptly on requests for interconnection, has attempted to impose unfair or unrealistic conditions. It does not comply with FERC policies on interconnection. It should be brought under FERC jurisdiction and/or required to comply with FERC policies.
G-21 Calpine	Electricity Interconnection	FERC jurisdiction	FERC needs authority over all transmission lines including those owned by Federal Agencies. Statutory changes are needed.
G-21 Calpine	Electricity Interconnection	FERC rules	FERC should conduct a rulemaking to let it set uniform rules on interconnection, to improve certainty. Calpine supports commissioner's recent statement on this point.
G-21 Calpine	General program management	Accountability	Timeframes and milestones should be established for all Federal and state agencies involved in review.
G-21 Calpine	General program management	Administrative appeals	Task force should recommend that the IBLA eliminate its backlog, reforming procedures if necessary. FS decisions are required in a matter of weeks, whereas IBLA appeals can take over two years.
G-21 Calpine	General program management	General	Federal land managers need to expedite siting of projects on fed land, esp. renewables. Gives example of the Four Mile Hill project which has been in the permitting and appeal process for 5 years. Currently pending before IBLA.
G-22 Department of Interior	General Program Management	Permitting Energy Projects	Need better coordination among federal agencies, particularly where there is multiple jurisdiction. Need mechanisms to resolve conflicts and issues. Need more accountability to keep permitting activities on schedule. Need to review existing policies, procedures, and processes to eliminate archaic or unnecessary guidance.
G-23 Western Area Power Authority	Electricity transmission	WAPA Process	WAPA should not be required to expedite bad projects
G-24 Unocal Corp.	Oil Importation	Permit Facilitation	Introducing a new permit application for the Bulk Oil Offshore Terminal System (BOOTS). Also recommends the task force look at available agency resources to support permit actions; need to prioritize permit actions; establish a preapplication process; streamlining NEPA; development of a centralized data repository; establishment of a tracking system.

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G-25 National Rural Electric Cooperative Association	Electric Transmission Line Construction	Financing rural electric transmission lines	All agencies should review their permitting processes to allow generating cooperatives faster access to construction financing
G-25 National Rural Electric Cooperative Association	Electricity Generation and Transmission Line Construction	Clean Air Act Requirement	Title V permitting is controversial and sometimes results in additional requirements being imposed on the applicant
G-25 National Rural Electric Cooperative Association	Electricity Generation and Transmission Line Construction	Clean Water Act Requirement	CWA s. 316(b) requirements for cooling systems at power plants are also a problem. Plants want to use the most efficient systems possible consistent with environmental requirements, but many install environmentally conservative but less efficient systems in order to avoid a prolonged permitting process.
G-25 National Rural Electric Cooperative Association	Electricity Generation and Transmission Line Construction	NSR reform	Redefinition of NSR requirements by EPA has caused great uncertainty, resulting in delays in upgrading capacity, improving efficiency and even reducing emissions.
G-25 National Rural Electric Cooperative Association	General program management	Agency resources	The USDA Rural Utilities Service is a major source of funding for energy-related projects conducted by rural cooperatives. This agency is struggling with a small staff. IT is working to streamline the financing process.
G-25 National Rural Electric Cooperative Association	General program management	Incentives for Improved Federal Coordination	A complete cultural change is needed at Federal, state and local agencies. The Task Force should use a full range of mechanisms that provide incentives, including transparency of the process, publicity on delays or successes, peer pressure, individual and agency accountability, incentives and disincentives related to career advancement and compensation.
G-25 National Rural Electric Cooperative Association	Scope and Mission of Task Force	Needed Solutions	Task force should not just identify impediments but also permanent solutions for the resolution of these impediments.
G-25 National Rural Electric Cooperative Association	Scope and Mission of Task Force	Scope of Energy Projects	The definition of energy projects should be expanded to include electric distribution lines and fuel procurement permitting such as coal mining – not just generation and transmission.
G-26 Interstate Oil & Gas Compact Commission	Oil and Gas Production	General Energy Policy	TF should review EPA hydraulic fracturing regulations. TF should review efforts to transfer inspection and enforcement activities to the States. TF should look at critical need for additional natural gas pipeline infrastructure

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G-27 Isaak Walton League	Oil & Gas Devel.	Environmental Impact	Stable funding source should be created for fish and wildlife habitats and other natural resources to assist the affected states in managing these resources through the development period. Proposes tapping revenues from on-shore oil and gas producers.
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Inadequate integration of NEPA, NHPA and ESA; must develop agreements between agencies that effectively address jurisdiction, better utilize NEPA documentation and scoping process, integrate environmental data needs, decision timing of reviews and decisions. Develop conflict resolution process. This comment applies to next 2 comments as well.
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Inadequate integration of NEPA and other Federal, State and local processes
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Inappropriate state and local permitting and mitigation requirements; improve consistency reviews, use MOAs, utilize better technical and field info, utilize performance based and industry recommended practices for mitigation, allow broader use of monitoring to for flexibility in mitigation implementation. This comment applies to next two comments below.
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Overlapping, inconsistent and inflexible state and local permitting and mitigation requirements
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Inadequate assessment of environmental impacts of substituting natural gas; consider indirect positive air quality impacts, encourage use by applicants of gas use, greater exchange of info between regulatory agencies on positive air impacts
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Inadequate inter-agency communication, coordination and decision making; collaboration with stakeholders in pre filing process; project specific MOA, pre-application scoping meetings and on-going status meetings
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Delayed, inefficient NEPA compliance process. FERC should develop a short environmental checklist/assessment instead of ER for level of NEPA compliance decision, ER format more consistent with NEPA document format, more EAs rather than EIS

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G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	All Federal agencies through and ongoing review and periodically re examine existing authorizations, policies, and procedures
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Greater consultation of agencies and CEQ on programmatic efforts
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Provide oversight to ensure accountability of local agency staff
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Develop time frames for individual projects
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	More willingness to dismiss frivolous or ideological public comments that are not focused on project specific issues
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Create better base line data banks for agency sharing
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Improve impact analysis by developing guidelines and standards, analysis should be consistent with weight of impacts
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA	Increase NEPA training for personnel, increase budget for compliance work, create NEPA coordinators
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA/CEQ	Require better, shorter, more readable NEPA documents

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G-28 Interstate Natural Gas Association of America	Pipelines	NEPA/CEQ	Require annotated outlines to serve as road map for EA/EIS prep
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA/CEQ	Update regulations to reflect current use of EA/FONSI
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA/CEQ	Time limit for private action
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA/CEQ	Increased use of categorical exclusions
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA/CEQ	Provide guidance on definition of "significance"
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA/CEQ	Require greater consistency in agency regulations
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA/CEQ	Develop good mitigation practice guides
G-28 Interstate Natural Gas Association of America	Pipelines	NEPA/EPA	EPA should be involved earlier than DEIS
G-29 Natural Resources Defense Council/ Southern Utah Wilderness Alliance	General program management	Agency resources	The single best way to increase the speed and efficiency of agency decision-making would be to provide them with adequate budgets. BLM identified specifically.

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G-29 Natural Resources Defense Council/ Southern Utah Wilderness Alliance	Role of Task Force	Relationship of task force to agencies	Task Force activities should not interfere with or override the legally required duties of Federal agencies, and review of their activities should be based on fact, not unsubstantiated industry criticism.
G-29 Natural Resources Defense Council/ Southern Utah Wilderness Alliance	Role of Task Force	Relationship of task force to agencies	The situation has changed, and the Task Force is not operating in a crisis.
G-29 Natural Resources Defense Council/ Southern Utah Wilderness Alliance	Role of Task Force	Relationship of task force to agencies	Compliance with substantive and procedural requirements should not be considered "impediments" to energy development. The vast majority of public lands remain open to oil and gas development.
G-29 Natural Resources Defense Council/ Southern Utah Wilderness Alliance	Role of Task Force	Relationship of task force to agencies	Task Force should not micro-manage the agencies, or redirect use of resources.
G-29 Natural Resources Defense Council/ Southern Utah Wilderness Alliance	Role of Task Force	Relationship of task force to agencies	Criteria for acceleration of projects should be developed with public input.
G-29 Natural Resources Defense Council/ Southern Utah Wilderness Alliance	Role of Task Force	Relationship of task force to agencies	Task force should limit review of policy issues relating to NSR reform; NSR is not a significant impediment to siting energy facilities.

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G-30 Princeton Energy Resources International	NEPA	NEPA	Implement the "Strategic Environmental Assessment" model developed by PERI to better coordinate the NEPA process
G-31 American Petroleum Institute	Oil and Gas Production	General Energy Policy	Inadequate agency resources; NEPA planning obstacles; onshore access to resources. CZMA affects on offshore access to traditional resource areas. Refinery permits and fuel quality issues.
G-32 State of New York, Department of Public Utilities	Electric Transmission Line Construction	Permitting procedures	Establish a task force to examine how Federal agencies can work cooperatively with state agency reviews.
G-32 State of New York, Department of Public Utilities	Electric Transmission Line Construction	Permitting procedures	Federal agencies should be required to start reviews at the same time as state agencies.
G-32 State of New York, Department of Public Utilities	Electric Transmission Line Construction	Permitting procedures	Federal agencies should rely on state agency findings where the state has engaged in comprehensive review.
G-32 State of New York, Department of Public Utilities	Electric Transmission Line Construction	Permitting procedures	Federal agencies should be required to engaged in concurrent reviews with state agencies.
G-33 Southern Company	Electric Transmission Line Construction	Permitting procedures	Enforce time limits on review of and acceptance permitting actions
G-33 Southern Company	General program management	General program management	TF should look at impediments to facility expansion as well as new facility construction.
G-33 Southern Company	General program management	General program management	TF should look at ways to enforce time limits on the review and acceptance of license conditions and intervention in proceedings.
G-33 Southern Company	General program management	General program management	TF should examine state as well as Federal issues, esp. coordination of regulatory programs among regions that might be impeding addition or expansion.
G-34 Nuclear Energy Institute	Nuclear facilities	Improved permit procedures	Reforms in nuclear plant licensing that were adopted in the Energy Policy Act of 1992 and codified in NRC regulations, will greatly improve the licensing process. (The new process and its benefits are described). This process has not yet been used. Recommends that TF address ways to expedite and improve the efficiency of the Early Site Permit process, and be expanded to include an NRC representative.

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G-35 Policy Solutions, Ltd.	Refinery/Gasoline	Clean Air Act	The patchwork of different gasoline formulas to protect the environment should be abandoned for sub regional standards
G-35 Policy Solutions, Ltd.	Refinery/Gasoline	Clean Air Act	Amend Clean Air Act to simplify gasoline requirements on a national basis
G-36 TXU	Electric Transmission Line Construction	Permitting procedures	Develop blanket agreements and boilerplate management plans
G-36 TXU	Electric Transmission Line Construction	Permitting procedures	EPA should propose to exempt electric distribution lines from Phase II storm water rules.
G-36 TXU	Electric Transmission Line Construction	Permitting procedures	Field trips by agency staff can provide first hand knowledge of process and issues.
G-37 National Petroleum Refiners Association	Refinery and petrochemicals	NSR	Clarify interpretation of "routine repair and maintenance"
G-37 National Petroleum Refiners Association	Refinery and petrochemicals	NSR	Reformulate "actual to potential" test which can trigger permitting requirements when there in fact will not be an increase in emissions
G-37 National Petroleum Refiners Association	Refinery and petrochemicals	NSR	Address issues in connection with the aggregation requirement and recent changes in the treatment of "debottlenecked and linked units."
G-38 SMUD, NYPA, APPA, Douglas County, WA	Hydro	See G-2	See G-2
G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	All permits should comply with the energy accountability mandate as contained in the President's Executive Order 13211. It needs to be implemented immediately and made permanent via legislation.
G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	Energy accountability implementation should include Memorandums of Understanding (MOU), Environmental Documents, interactions with bureaus within the Department of Interior, such as Fish and Wildlife, performance standards for managers.

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G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	The permitting process should be streamlined and shortened.
G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	Expediting and fully funding the NEPA process for priority plays in the Rockies
G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	Establish an onshore gas and oil advisory committee that reports to the Secretary of Interior
G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	Eliminate unwarranted denials and stays of lease issuance.
G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	Transfer oil and gas permitting approvals to states, which are much more efficient.
G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	Execute a MOU making energy approvals more efficient among Forest Service, BLM, F&WS, and other involved agencies.
G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	Eliminate permits that have been backlogged over the last eight years.

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G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	Replace the royalty payment process with the much more efficient royalty in-kind process.
G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	Renew meaningful deepwater royalty relief and other lease term relief for other difficult wells such as subsalt, high deviated, deep shelf drilling, and other areas. Solve numerous "permit" problems with regard to conflicts between Department of Commerce and Department of the Interior stemming from the Coastal Zone Management Act.
G-39 Independent Petroleum Association of America	Oil and Gas Production	General Energy Policy	Streamline the offshore pipeline process in fairway and anchorage areas by the USACE.
G-40 State of Wyoming	Oil and Gas Production	General Energy Policy	Need to increase energy supply and infrastructure with federal government and State government as full partners; the Scope of NEPA needs to be reviewed and modified to better fit with the initial intent of NEPA--the process has become the goal. Lack of adequate coordination between two DOI agencies, BLM and FWS; Better training; reduce inconsistencies among agencies; establish a western CEQ presence; review the historic trails policies. Review policy guidance that preempts State primacy; streamline pipeline permitting process; streamline NHPA Section 106 reviews.
G-41 Northeast Utilities	Hydro	Conditioning	Account for economics in 4(e) process.
G-41 Northeast Utilities	Hydro	Legislation	"place mandatory conditioning authority under FERC's balancing obligation;" Need one entity to balance competing interests (of which the environment is one).
G-42 STAPPA-ALAPCO	General program management	Agency funding	To streamline the permitting process, EPA's BACT/LAER clearinghouse should be upgraded and better funded. This will help state permit writers complete technical reviews efficiently.
G-42 STAPPA-ALAPCO	General program management	Impact on energy supply	Air permitting requirements currently implemented by EPA and states are not preventing adequate number of power plants from coming on line. Data submitted.
G-42 STAPPA-ALAPCO	General program management	Public Participation	Any streamlined process should maintain a strong role for public comment.
G-42 STAPPA-ALAPCO	Role of Task Force	NSR reform	The task force should coordinate efforts with, and not duplicate, the NSR reform efforts.

RECOMMENDATIONS FROM GENERAL COMMENTS

Committer	Subject	Topic	Comments
G-43 US PIRG	Conservation projects	Importance of conservation	The EO appears to give conservation projects relatively little attention. This is a mistake. Measures to improve energy efficiency have been neglected. Addressing impediments to conservation should be the central focus of the task force, and should be reflected in the TF organization and composition (Extended discussion of merits of conservation vs. other strategies).
G-43 US PIRG	Conservation projects	Role of public participation	Goal of expediting energy projects should be subordinate to the deliberate nature of the planning process and its requirements for public comment and consideration of alternatives.
G-43 US PIRG	Exploration and production	Agency jurisdiction	TF should defer to agencies' judgment as to when relocation, redesign and delay of energy related projects are necessary to meet legal requirements.
G-43 US PIRG	Exploration and production	Balancing values	Mineral development is only one of many values to be provided for and does not take precedence over other values. It might be argued that FLPMA places ecological, recreational and wildlife considerations ahead of mineral development.
G-43 US PIRG	Exploration and production	Balancing values	It is the intent of Congress that some lands be closed to oil and gas development; development is only one of many considerations.
G-43 US PIRG	Exploration and production	Balancing values	The TF should clarify how its focus on energy will be balanced with the statutory recognition of multiple values.
G-43 US PIRG	Exploration and production	Balancing values	Some lands should be off-limits to development, and denials on this ground, or conditions to reduce impact on other values, should not be considered impediments.
G-43 US PIRG	Renewables	Importance of renewables	The TF should champion clean renewable technologies such as wind, solar, clean biomass, and geothermal.
G-43 US PIRG	Role of Task Force	Agency independence	The TF must not interfere with existing decision-making procedures of Federal agencies provided for by law.
G-43 US PIRG	Role of Task Force	Compliance with legal requirements	"Impediments" should be narrowly defined. Inefficiencies and lack of funding are legitimate impediments. Agency compliance with laws should not be considered "impediments".
G-43 US PIRG	Role of Task Force	Compliance with legal requirements	The TF should work to ensure full and deliberate compliance with the statutes.
G-44 American Gas Association	Pipelines	Better Coordination of NEPA Process	Support the adoption of Interagency Agreement
G-44 American Gas Association	Pipelines	Corps Wetland Permits	Compensatory mitigation should not be required in all cases.
G-44 American Gas Association	Pipelines	Corps Wetland Permits	Need better definition of "mechanized land cleaning"

RECOMMENDATIONS FROM GENERAL COMMENTS

Commenter	Subject	Topic	Comments
G-44 American Gas Association	Pipelines	Corps Wetland Permits	No SHPO consultation should be required when project has no known cultural resource impacts
G-44 American Gas Association	Pipelines	Products Pipelines	States should establish permit coordinator within Governor's offices
G-45 Nat'l Parks Conservation Association	Electricity generation	Fed-state coordination	Participated in creation of an MOA between DOI and Tennessee to streamline process for review of impacts on Class I areas. This agreement should be reviewed for broader applicability.
G-45 Nat'l Parks Conservation Association	Electricity generation	NSR reform	Concerned about proposed relaxation of CAA permitting processes in the name of facilitating development of new power plants. At Great Smoky Mountains NP, NPS has had to issue "unhealthy air" notices on 140 days in the past 4 years. Visibility is declining. Power plants proposed in Virginia potentially worsen pollution in Shenandoah NP.
G-45 Nat'l Parks Conservation Association	Electricity generation	NSR reform	The existing regulatory structure does not present insurmountable barriers to developing new power plants.
G-45 Nat'l Parks Conservation Association	Electricity generation	Political bypasses	Delays in processing permits for new sources are generally caused not by unnecessary bureaucratic process but by applicants and states that seek political bypasses to gathering and analyzing needed information.
G-46 National Mining Association	Coal production	General Energy Policy	Provide flexibility under NEPA; Complete review of USFS roadless policy; eliminate duplication of information collection for coal mining activities.
G-47 Duke Energy	Electricity generation	Fed coordination	TF should support a dialogue between DOE and EPA on how to most effectively reform the air regulatory programs in a cost-effective manner.
G-47 Duke Energy	Electricity generation	Fed-state coordination	Consistent application of regulations by EPA and states (e.g., BACT and LAER) is extremely important to power plant development. Permit variances need to be provided for peaking and intermediate power plants to reflect the fact that they will cycle up and down frequently resulting in occasional excursions.
G-47 Duke Energy	Electricity generation	Fed-state coordination	TF should look at relationships between Federal and state air regulators, and between air regulators and other regulatory programs. Siting the landfill for disposal of scrubber waste could take up to 4 years. Federal permitting reform will not help if other state requirements are not reformed.
G-47 Duke Energy	General program management	Agency culture	The need to expedite energy projects should be disseminated within the agencies.
G-47 Duke Energy	General program management	Fed coordination	Better coordination among Federal agencies offers great opportunities - coordinate schedules where multiple actions are required and sharing information.

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Commenter	Subject	Topic	Comments
G-47 Duke Energy	General program management	Fed-state coordination	Improving coordination with state and local regulators is of vital importance. For example, state inaction under s. 401 of the CWA can stifle energy projects.
G-47 Duke Energy	Hydro	Balancing interests	Mandatory conditioning authority should be exercised in a way that leads to licensing decisions that balance environmental, energy and economic concerns.
G-47 Duke Energy	Hydro	Fed coordination	Existing work on improving coordination in hydropower licensing should also be continued.
G-47 Duke Energy	Hydro	Fed-state coordination	Hydropower relicensing is one of the processes most in need of reform. Better coordination with state regulators is necessary. State CWA s. 401 certifications can be a source of delay; perhaps they could be merged with NPDES permitting.
G-47 Duke Energy	Hydro	Information gathering	Studies should be required only when truly needed to assess impacts of the project.
G-47 Duke Energy	Hydro	Need for action	Hydropower licensing reform is a prime example of a regulatory program where legislative reform is needed.
G-47 Duke Energy	Nuclear energy	NRC reforms	NRC has made some significant improvements in its relicensing process, and that process works quite efficiently. For example, in fulfilling NEPA requirements NRC allowed many issues to be addressed generically.
G-47 Duke Energy	Nuclear energy	NRC role	NRC should participate in the TF.
G-47 Duke Energy	Pipelines	MOA	Work on improving coordination in NEPA review for gas pipelines should be pushed through to fruition.
G-47 Duke Energy	Pipelines	Need for action	Approval of natural gas pipelines is one of the processes most in need of reform.
G-47 Duke Energy	Role and makeup of task force	FERC and NRC roles	FERC and NRC should participate, given their central role in regulatory matters.
G-47 Duke Energy	Role and makeup of task force	Focus on system, not projects	TF can be most helpful by improving the overall interagency and intergovernmental. Processes and emphasizing importance of energy projects. It will not have resources to address a significant number of projects and should work on them where there are strategic opportunities - projects of national significance or those using innovative regulatory approaches.
G-48 Marathon Oil Company	Oil and Gas Production	General Energy Policy	Additional staff resources needed to process permits; need to have agencies standardize interpretation of rules and not continually change policies; Need to reduce impediments to onshore resource access; need to eliminate impediments to offshore resource access as a result of CZMA regulations; need to have better interagency coordination; need more certain schedules for NEPA document development

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Commenter	Subject	Topic	Comments
G-49 Public Lands Advocacy	Oil and Gas Production	General Energy Policy	Additional staff resources needed to process permits; need a pre-filing process to help facilitate permit applications; Need to reduce impediments to onshore resource access; need to have better interagency coordination; need more certain schedules for NEPA document development
G-50 Edison Electric Institute	Electricity generation	Federal coordination	Recommends that upon request by an applicant for a Federal permit for a generating or transmission facility, a lead Federal agency be designated to coordinate Federal environmental review. The lead agency would generate a single comprehensive record with specific inputs from other Federal agencies, states, local governments and the public. This should be at the applicant's option. Several states have such a one-stop approach.
G-50 Edison Electric Institute	Electricity generation	NSR reform	Recommends a "well-designed multi-emissions approach that reasonably regulates Nox, SO2 and mercury and provides certainty for generators."
G-50 Edison Electric Institute	Electricity generation	NSR reform	The task force should address the issue of tribal permitting and environmental review processes to ensure that tribal requirements and conflicts between tribal jurisdictions, as well as between tribal and non-tribal entities, can be timely and effectively resolved. Time frames for tribal comments must be consistent with time frames for other public commenters.
G-50 Edison Electric Institute	Electricity transmission	Federal Barriers	Imperative that the Task Force take administrative action now to remove Federal barriers to expansion of the transmission system.
G-50 Edison Electric Institute	Electricity transmission	Federal coordination	After this group is established, DOI should issue a joint MOA and supporting regulations to codify the group's recommended improvements. Comments provide detailed recommendations on the content of such an MOA.
G-50 Edison Electric Institute	Electricity transmission	Investment	Investments in transmission are declining because of a combination of economic and regulatory factors
G-50 Edison Electric Institute	Electricity transmission	Need for additional permitting capacity	Demand is growing and reserve margins are declining, showing need for more generating capacity
G-50 Edison Electric Institute	Electricity transmission	Need for permitting deadlines	Open-ended nature of permitting, without maximum time limits, is a significant barrier. Prompt timeframes should be established for the various agencies to conduct their reviews, with a central agency office to monitor and enforce the deadlines.
G-50 Edison Electric Institute	Electricity transmission	NSR reform	NSR reform and the enforcement initiative has created regulatory uncertainty which has a variety of adverse effects

RECOMMENDATIONS FROM GENERAL COMMENTS

Commenter	Subject	Topic	Comments
G-50 Edison Electric Institute	General program management	Compliance flexibility	Agencies should provide necessary authority for the permittees to maintain and operate their facilities in a reasonable way, to ensure reliable electricity supply.
G-50 Edison Electric Institute	General program management	Early input from federal agencies	Agencies should provide applicants with feedback as early in the process as possible on concerns they may have or issues they would like addressed.
G-50 Edison Electric Institute	General program management	Early input from federal agencies	Agencies should identify proposed permit terms and conditions as soon as possible, and give applicants the opportunity to propose less costly alternatives.
G-50 Edison Electric Institute	General program management	Federal Coordination	Each agency with authority over Federal lands should establish a working group comprised of a senior political appointee from each of their offices to confer on ways to coordinate and facilitate decisions on transmission ROWs across Federal land.
G-50 Edison Electric Institute	General program management	Impact of increased demand	Increased demand and limited growth has created major increases in congestion on the transmission network
G-50 Edison Electric Institute	General program management	Permitting process	Agencies should make an on-the-record, impartial, speedy and affordable administrative review process for permit decisions.
G-50 Edison Electric Institute	General program management	Permitting process	Agencies should promote the use of applicant and third-party prepared environmental review documents
G-50 Edison Electric Institute	General program management	Permitting process	Agencies should allow applicants the option to fund permit processing either directly to the agency or through use of a third-party permit processor.
G-50 Edison Electric Institute	General program management	Suggestions for improved process	Encourages task force to: ensure adequate recognition of the nation's electricity needs in agency permitting decisions; eliminate duplicative processes; streamline review processes; impose reasonable but specific and enforceable timeframes for agency review; institute procedures to require concurrent rather than sequential review processes
G-50 Edison Electric Institute	General program management	Tribal coordination	Task Force should address tribal permitting and environmental review processes.
G-50 Edison Electric Institute	NEPA	Federal-state coordination	Federal NEPA requirements should be coordinated with state environmental reviews and conducted in parallel rather than sequentially.
G-50 Edison Electric Institute	NEPA	Federal-state coordination	Comment above re NEPA applies to many other processes as well: e.g., s. 404 permitting, cultural resource reviews, ESA.:
G-50 Edison Electric Institute	Task Force Mission	Support for Task Force	Applauds the establishment of the task force under EO 13212.

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Commenter	Subject	Topic	Comments
G-51 American Chemistry Council	Electricity generation	Need for EPA/DOE policy coordination	There is a conflict between EPA's recent NSR guidance on combined heat and power (CHP) and its new CHP partnership, and the DOE recommendation that a key section of PURPA be repealed that has been instrumental in the growth of CHP use. The PURPA provision should remain in effect at least for the next few years.
G-51 American Chemistry Council	Electricity generation	NSR reform	EPA's current interpretation of the NSR program should be reviewed, especially with regard to modifications at existing facilities. It discourages projects that increase energy production, improve efficiency and reduce emissions. Also of concern is the way EPA determines whether there is a significant emissions increase.
G-51 American Chemistry Council	Task force	Role and makeup	FERC should be included in the task force to the extent possible.
G-51 American Chemistry Council	Task Force	Role and makeup	The TF should stick to its mandate of working with agencies; another layer of regulation should not be added to the existing regime.
G-52 Double Eagle Petroleum Company	Oil and Gas Production	General Energy Policy	Federal agencies in Wyoming are individually interpreting NEPA requirements and placing impediments to orderly development of natural resources.
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Additional environmental protections that would be beneficial	Additional public health and environmental analyses should be required of the applicant as a prerequisite to permit issuance. (To be consistent with latest science and guidance on case-by-case consideration of SO ₂ .)
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Additional environmental protections that would be beneficial	Notice requirements for Title V and PSD should be expanded to include all potentially downwind communities.
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Importance of current environmental requirements	Interagency environmental reviews must be preserved; the requirements in the existing system should not be considered "impediments".
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Importance of current environmental requirements	The TF should not streamline away meaningful opportunities for public participation in the process leading to permit issuance.
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Market influences on new generation	Environmental regulations have not impeded the development of new capacity. Reluctance to build new facilities has been more associated with an uncertain need for new capacity and utilities being unwilling to make major new investments when faced with uncertain regulatory structures for recovery of costs.

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Commenter	Subject	Topic	Comments
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Other constraints on development	New development is constrained more by continued use of old, grandfathered plants that use up a large part of the allowable emissions.
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Questions need for streamlining permits	CATF disagrees with the goal of expediting permits for new power plants – these plants present well document health risks, esp. conventional coal plants.
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Questions need for streamlining permits	Current regulatory processes have not caused any shortage of new plant proposals or any electric system reliability problem.
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Role of Task Force	The TF should not be used as a tool to limit public participation requirements in the statutes.
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Some suggested streamlining measures unwise	The current stay of PSD permit issuance while a decision is being appealed should be retained. Eliminating it would eviscerate the public’s ability to participate meaningfully in permit review and appeals.
G-53 Clean Air Task Force (and 42 other groups)	Electricity generation	Task Force bias	The administration’s support for conventional coal power biases the task force.
G-53 Clean Air Task Force (and 42 other groups)	Role and makeup of task force	Makeup of Task Force	Environmental and public health organizations should be represented on the task force.
G-54 Marathon Ashland Petroleum	Refinery and permitting	Better Coordination of the permitting Process	Lack of coordination among agencies can result in time delay, repetitive work and poor use of resources.
G-54 Marathon Ashland Petroleum	Refinery and permitting	NSR Reform	NSR reform must continue forward to establish clear consistent rules.
G-55 Association of Oil Pipe Lines	Oil Pipelines	Better Coordination of Authorization Process	Consolidate data collection, concurrent review and collapse review time
G-55 Association of Oil Pipe Lines	Oil Pipelines	Better Coordination of Authorization Process	Participate/Encourage agreements to speed decision making
G-55 Association of Oil Pipe Lines	Oil Pipelines	Better Coordination of Authorization Process	Engage in states in efforts to coordinate state and Federal processes
G-55 Association of Oil Pipe Lines	Oil Pipelines	Better Coordination of Authorization Process	Identify statutory impediments to the above
G-57 Chamber of Commerce of the United States	Energy Development	General Energy Policy	Need better coordination of the permitting processes among federal agencies.

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Commenter	Subject	Topic	Comments
G-58 The Wilderness Society	Task Force Mission	Perceived pro-development bias in TF mission	Change mission statement to include; that decisions regarding energy related projects are made in a timely fashion.
G-58 The Wilderness Society	Task Force Mission	Perceived pro-development bias in TF mission	Change mission statement to include that energy related projects that receive Federal agency approval do so when in full compliance with all pertinent environmental laws, regulations and procedures.
G-58 The Wilderness Society	Task Force Mission	Perceived pro-development bias in TF mission	Change mission statement to include a goal to improve the transmission of energy in environmentally safe ways.
G-58 The Wilderness Society	Task Force Mission	Permitting procedures	Change mission statement to include a goal to better-coordinated Federal agency permitting activities in geographic are of increased activities.
G-59 Center for Energy and Economic Development	Other policy issues	Federal agency actions inconsistent with NEP	The Federal Land Managers' Air Quality Related Values Workgroup report (FLAG) significantly and adversely affects the ability to achieve NEP goals. The TF should urge the FLMs to withdraw the report or revise it consistent with the comments.
G-59 Center for Energy and Economic Development	Other policy issues	Specific agency action inconsistent with NEP	EPA's regional haze rules significantly and adversely affect the ability to achieve NEP goals. The TF should urge EPA to withdraw the rules or revise them consistent with the comments.
G-59 Center for Energy and Economic Development	Other policy issues	Specific agency report inconsistent with NEP	FLAG adds new requirements unsupported by statutes and regulations, and dramatically expands the scope of areas subject to AQRV review.
G-59 Center for Energy and Economic Development	Other policy issues	Specific agency report inconsistent with NEP	FLAG was issued as guidance but is an improperly promulgated rule.
G-60 Domestic Petroleum Council	Oil and Gas Production	General Energy Policy	The Bureau of Land Management needs to benchmark its permit processes to try to transfer "best practices" among the various field offices.
G-60 Domestic Petroleum Council	Natural gas and oil exploration and production	DOI/MMS/BLM	BLM planning needs improvement
G-60 Domestic Petroleum Council	Natural gas and oil exploration and production	DOI/MMS/BLM	Process for Applications for Permits to Drill must be improved by adding consistency, personnel/budget, eliminating duplicative processes, training to match changes in industry and government directives

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Commenter	Subject	Topic	Comments
G-60 Domestic Petroleum Council	Natural gas and oil exploration and production	DOI/MMS/BLM	Proposes a 2 step nationwide permit benchmarking project at BLM to build on 1996 Report. Project to include review of 96 report and nation wide survey about permit applications received and processed; analysis of office by office data to identify correlation with higher numbers of processed applications; field visits to capture best practices; action plan to implement "best practices", establish evaluation process.
G-61 NARUC	Electricity generation	NARUC assistance to Task Force	Can provide examples of projects that would have benefited from better Federal and state coordination.
G-61 NARUC	Electricity generation	State role in siting energy facilities	Understands the need for additional generation and transmission, and the need to do so in a safe and environmentally protective manner. Recognizes the difficulties in siting these facilities. Nevertheless the states have been successful in siting the infrastructure that exists today and their experience will be helpful to the task force.
G-61 NARUC	Electricity generation	State role in siting energy facilities	States are the appropriate authorities to exercise jurisdiction over siting of most energy infrastructure including generation and transmission.
G-61 NARUC	Electricity generation	Task Force Coordination with states	TF should make coordination with the state commissions an integral part of any and all aspects of its activities.
G-62 Devon Energy Corp.	Oil and Gas Production	Air permit requirements	"Minor source" air permits are required for the production equipment. Construction is prohibited for 30 to 180 days pending issuance of the permit or approval of a Notice of Intent, depending on potential emission rate.
G-62 Devon Energy Corp.	Oil and Gas Production	Air permit requirements	Wyoming Department of Environmental Quality allows construction to begin as soon as NOIs have been filed and emissions controls have been installed. This allows faster response to energy demands.
G-62 Devon Energy Corp.	Oil and Gas Production	Air permit requirements	EPA and state agencies should standardize air permit procedures related to oil and gas production facility air quality, allowing production to begin soon after drilling is completed. Should allow estimating emissions and operating with temporary controls based on the estimate, with additional controls required if necessary when the final permit is issued.
G-62 Devon Energy Corp.	Oil and Gas Production	Air permit requirements	Wyoming Department of Environmental Quality approach to air permitting of wells should be adopted nationwide.
G-62 Devon Energy Corp.	Oil and Gas Production	BLM approval process	BLM's APD approval process should be expedited to the fullest extent possible.
G-62 Devon Energy Corp.	Oil and Gas Production	BLM approval process	Results of the national benchmarking study should be applied to all BLM field offices

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Commenter	Subject	Topic	Comments
G-62 Devon Energy Corp.	Oil and Gas Production	BLM approval process	BLM field office procedures should be consistent in the limitations imposed by Interim Drilling Policies
G-62 Devon Energy Corp.	Oil and Gas Production	BLM staff resources	BLM field offices should be adequately staffed. Current staff are helpful and hardworking, but there are not enough of them to do the work currently required.
G-62 Devon Energy Corp.	Oil and Gas Production	Federal review process	Drilling and producing on Federal land requires multiple approvals – permit to drill, rights of way, seismic permits, archaeological survey, sometimes an EA. “This process is laborious, expensive and time consuming”
G-62 Devon Energy Corp.	Oil and Gas Production	NEPA review process	EISs cause significant delays. If within the scope of an existing EIS, it can still take a year; if a new EIS is required it may take two years.
G-62 Devon Energy Corp.	Oil and Gas Production	NEPA review process	Time limits required by NEPA for EISs should be implemented and enforced.
G-62 Devon Energy Corp.	Oil and Gas Production	NPDES Permit requirements	Wyoming DEPARTMENT OF ENVIRONMENTAL QUALITY has imposed requirements for surface water discharge permits (NPDES) beyond those required Federally. EPA should assure that state guidelines are consistent with Federal guidelines.
G-62 Devon Energy Corp.	Oil and Gas Production	NPDES permit requirements	EPA has also imposed restrictions beyond what is in the Federal rules. Specifically, EPA Region 8 is developing guidance for use of “best professional judgment” for coalbed methane production; commenter believes this is not justified under existing rules. EPA should reverse its finding that BPJ is required for coalbed methane NPDES permits EPA and states should treat coalbed methane production the same as other types of natural gas production.
G-62 Devon Energy Corp.	Oil and Gas Production	NPDES permit requirements	EPA is considering requiring zero discharge technologies. EPA should not prohibit discharge of produced waters. Prohibiting discharge of produced waters would preclude beneficial use for wildlife, livestock and agriculture.
G-62 Devon Energy Corp.	Oil and Gas Production	NPDES permit requirements	Costing assumptions used by EPA in its study of coalbed methane requirements are erroneous. EPA should use the same costing assumptions for all natural gas (in context of coalbed methane production)
G-62 Devon Energy Corp.	Oil and Gas Production	NPDES permit requirements	EPA Region 8 has asked WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY to set numerical limits for specific conductance and sodium adsorption ratio for coalbed methane discharges, but there are no Federal requirements. EPA should not impose requirements on WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY that exceed what is in the Federal requirements.

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Commenter	Subject	Topic	Comments
G-62 Devon Energy Corp.	Oil and Gas Production	NPDES permit requirements	Commenter also makes technical arguments against the specific conductance and sodium adsorption rates proposed by EPA
G-62 Devon Energy Corp.	Oil and Gas Production	NPDES permit requirements	EPA should coordinate its BPJ study with state practices and/or change the focus to water management practices that can prevent or mitigate impacts.
G-62 Devon Energy Corp.	Oil and Gas Production	NPDES permit requirements	EPA should assure that state NPDES guidelines are consistent with Federal guidelines including 40 CFR Part 435, Subpart E.
G-63 League of Women Voters of Tenn.	Energy conservation	Emphasis	Renewable sources should be given preferential consideration.
G-63 League of Women Voters of Tenn.	Energy conservation	Focus of TF	Waste reduction should be the principle focus.
G-64 Flying J Oil & Gas Inc.	Oil and Gas Production	Permitting procedures	Asking the Task Force to review Wyoming air quality regulations, the BLM APD permitting process, and BLM requirement being applied to private lands and minerals.
G-65 Sempra Energy (old ET-5)	Electric Transmission Line Construction	Permitting procedures	FWS should return to the concept of habitat-based assurances.
G-65 Sempra Energy (old ET-5)	Electric Transmission Line Construction	Permitting procedures	Multi-disciplinary teams should administer HCP's.
G-65 Sempra Energy (old ET-5)	Electric Transmission Line Construction	Permitting procedures	Repeal the Critical Habitat Provision of the ESA.
G-65 Sempra Energy (old ET-5)	Electric Transmission Line Construction	Permitting procedures	FWS should adopt a policy that requires deference to conservation measures in established HCP's.
G-65 Sempra Energy (old ET-5)	Electric Transmission Line Construction	Permitting procedures	Codify "No Surprises" rule and habitat based assurances.
G-66 Shell Exploration and Production Co.	Federal funding	New technology	New technologies would be achieved faster by providing Federal funding for the Deepstar project, currently funded by industry alone.
G-66 Shell Exploration and Production Co.	Federal workload	Archeologist staffing	BLM field offices should consider hiring contractors to help prepare cultural reports which cause excessive delays.

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Commenter	Subject	Topic	Comments
G-66 Shell Exploration and Production Co.	Leases in Remote Areas	Suspension of Production	Recommend this program be implemented only in remote deepwater areas.
G-66 Shell Exploration and Production Co.	Oil and Gas Production	General Energy Policy	TF needs to review recent revisions to CZMA regulations that will have significant effects on the development of potential offshore oil and gas resources.
G-66 Shell Exploration and Production Co.	Regulations	Coastal Zone Management Regulations	New regulations do not provide time limits for appeals.
G-66 Shell Exploration and Production Co.	Regulations	Coastal Zone Management Regulations	Recent revision of NOAA Federal Consistency regulations created obstacles to permitting of OCS development with no real benefits.
G-66 Shell Exploration and Production Co.	Regulations	Coastal Zone Management Regulations	New definition includes indirect effects without regard to significance.
G-66 Shell Exploration and Production Co.	Regulations	NPDES General Discharge Permit	EPA Region IV can expedite permits of OCS development in the Eastern Gulf by expanding applicability of the General Permit to all water depths.
G-67 Karuk Community Development Corporation	Renewables	Biomass production	Interest in building a biomass power plant in remote area. Believe in Dual Sustainability: hazard fuel treatments driven by market incentives to address fire problem on Federal lands and alleviate rural economic depression.
G-74 Cement Kiln Recycling Coalition	Energy Recovery	Waste Minimization	Would like the EPA to discontinue practice of requiring multi-pathway indirect site-specific risk assessments (SSRAs) for their member plants or subject SSRAs to the notice-and-comment rulemaking process. Current requirements for SSRAs founded in agency guidance only. Claim have been subjected to arbitrary and frequently changing requirements, which have added significant cost, delay and uncertainty to the permitting process for their member plants.